



Charles T. Drevna
President

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Congressman Pete Olson
United States House of Representatives
312 Cannon House Office Building
Washington, D.C. 20515

Congressman Bob Latta
United States House of Representatives
2448 Rayburn House Office Building
Washington, D.C. 20515

Dear Representatives Olson and Latta:

The American Fuel & Petrochemical Manufacturers (AFPM) is writing in support of the Clean Air, Strong Economies (CASE) Act. The current regulatory environment for manufacturing in the United States is overly burdensome, stringent and forces American business to spend scarce capital resources to comply with unnecessary, redundant and in some cases conflicting rules. The upcoming rule for the ozone National Ambient Air Quality Standard (NAAQS) is a prime example of a regulation that could threaten the U.S. manufacturing renaissance while providing very little benefit.

Reducing the ozone NAAQS levels below the current standard of .075ppm would cause severe harm to the economy and jobs, while providing little to no environmental or public health benefit. Reductions in the current ozone NAAQS will threaten many areas with nonattainment, stopping facility expansions and other capital investment.

Because of the lengthy delay and reconsideration of the current standard in 2009, many counties and states are just beginning to comply with the standard that was established in 2008. If EPA were to lower the ozone NAAQS in the near future, it will only create additional uncertainty for manufacturers and the economy. It will take several years before the current counties in nonattainment at .075ppm will be able to comply. The continuation of reducing the ozone NAAQS standard will become increasingly meaningless if the EPA continues to lower it to levels that cannot be met due to technological constraints.

A recent National Association of Manufacturers study shows that that lowering the ozone NAAQS could possibly lead to 2.9 million fewer jobs and cost \$270 billion dollars every year to comply. The U.S. has reduced ozone levels by 30 percent since 1980. That trend will continue without lowering the current standard as the counties and states currently in nonattainment start implementing their plans to reduce ozone levels. In other words, moving the goalposts by reducing the ozone standard would be all cost and no benefit.

We look forward to working with you to bring common sense to the U.S. regulatory regime.

Sincerely,

Charles T. Drevna